

**COMMONWEALTH OF MASSACHUSETTS  
BEFORE THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications )  
and Energy on its own motion as to the propriety of the )  
rates and charges set forth in the following tariffs: ) D.T.E. 01-56  
M.D.T.E. Nos. 280 through 305, filed with the )  
Department on July 17, 2001 by The Berkshire Gas Co. )

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**WESTERN MASSACHUSETTS ELECTRIC COMPANY'S PETITION  
FOR LIMITED PARTICIPATION STATUS**

Western Massachusetts Electric Company ("WMECO" or the "Company")  
hereby submits its petition to the Department of Telecommunications and Energy  
("Department") for limited participation status in the above-captioned  
proceeding, pursuant to 220 CMR 1.03(1)(e). The Company states the following in  
support of its petition:

1. WMECO is a Massachusetts electric company subject to the  
regulatory jurisdiction of the Department with a principle place of business at 174  
Brush Hill Avenue, West Springfield, Massachusetts 01090-2010.
2. WMECO provides electricity service to customers in 59 cities and  
towns in Massachusetts.
3. WMECO is an operating company in the Northeast Utilities system,  
the largest electric utility system in New England, with operating subsidiaries in  
Massachusetts, Connecticut and New Hampshire.
4. On July 17, 2001, Berkshire Gas Company ("Berkshire") filed a  
petition with the Department seeking a rate increase and a performance-based-

ratemaking (“PBR”) system. Included in the PBR will be a system of service quality standards.

5. On July 19, 2001, the Department issued an Order of Notice stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by August 20, 2001.

6. In conducting adjudicatory hearings, the Department may “allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose” as the Department may order. *See* G.L. c. 30A, § 10, cl. (4); *see, also*, 220 CMR 1.03(1)(b).

7. WMECO has a substantial and specific interest in intervening in these proceedings because Berkshire’s filing addresses or will address significant issues relating to PBR and service quality standards. WMECO and Berkshire jointly filed (with other parties) comments in D.T.E. 99-84 on service quality standards and D.T.E. 01-56 will be the initial proceeding subsequent to its Order in D.T.E. 99-84 (June 29, 2001) in which the Department adjudicates an individual company’s service quality standards. WMECO anticipates that many of the issues raised in Berkshire’s proceeding with respect to service quality standards will be similar to those raised in a future proceeding involving WMECO. Accordingly, any decision by the Department in this proceeding will substantially and significantly affect the service quality standards WMECO may be allowed to adopt.

8. WMECO, therefore, has a significant interest in the outcome of these proceedings and wishes to protect its interests and the interests of its customers by participating herein. No other party can adequately represent WMECO in this proceeding.

9. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

10. WMECO may have information that will aid the Department in its evaluation of the proposed service quality standards.

11. Given the above, WMECO is “substantially and specifically affected” by this proceeding as set forth in the General Laws and the Department’s regulations.

12. If granted limited participation status, WMECO will make every effort not to burden administratively this proceeding.

13. WMECO requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to the persons identified below:

Stephen Klionsky, Esq.  
Western Massachusetts Electric Company  
260 Franklin Street, 21<sup>st</sup> Floor  
Boston, MA 02110

and

Donald Bishop  
Senior Analyst  
Western Massachusetts Electric Company  
260 Franklin Street, 21<sup>st</sup> Floor  
Boston, MA 02110

**WHEREFORE**, WMECO respectfully requests that the Department allow  
its petition for limited participation in this proceeding.

Respectfully submitted,

WESTERN MASSACHUSETTS  
ELECTRIC COMPANY

By its attorney,

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Stephen Klionsky  
260 Franklin Street, 21<sup>st</sup> Floor  
Boston, MA 02110-3179  
Tel: 617/345-4778  
Fax: 617/345-4780  
E-mail: klionsh@nu.com

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